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Admitted to Practice Law
in the State of New York

July 14, 2023

Via Regular Mail and Email: steven.moser@moserlawfirm.com

Steven J. Moser, Esq.
Moser Law Firm, P.C.
5 E. Main Street
Huntington, New York 11743

Re: Jonatan Barahona and Hector Hernandez v. Paradise Tree
Service & Landscape, Corp. and William Nieto
Venue: United States District Court, Eastern District of New York
Civil Action No.: 2:21-cv-05400 (GRB)(AYS)

Dear Mr. Moser:

Regarding the above matter, please find enclosed herein an original fully executed IRS 4506 Form and copy of my client's driver's license. The 4506 Form and driver's license authorizes your firm to obtain copies of my client's business's federal tax returns for the years 2017, 2018, 2019, 2020 and 2021. This is in full compliance of the Judge's recent Order.

Please provide me with an original and copy of my client's deposition transcript and executed 4506 Forms to obtain each one of your client's tax returns for the years 2017, 2018, 2019, 2020 and 2021. Respectfully, I remain,

Sincerely yours,



Glenn J. Ingoglia

GJI/vv

Encls.